

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

*In Re Jackson Water Cases,
This Document Relates to All Plaintiffs
Identified in Exhibit 1*

v.

The City of Jackson, Mississippi, et al.,

No. 3:23-cv-00614-CWR-LGI
(Main Docket)

Hon. Carlton W. Reeves,
U.S. District Judge

Hon. LaKeysha Greer Isaac,
U.S. Magistrate Judge

PLAINTIFFS' MOTION TO ADD NEW PLAINTIFFS

1. Plaintiffs hereby request permission to add forty-four (44) plaintiffs to the above captioned matter.¹
2. Plaintiffs have complied with the notice requirements of Miss. Code Ann. § 11-46-1, which requires Plaintiffs to either receive a denial of claim following the filing of a Notice of Claim; or wait ninety (90) days before filing an action.
3. Plaintiffs sent via registered mail Notices of Claim to the City Defendants and Mississippi State Department of Health in this case on February 15, 2024. Plaintiffs

¹ Section III of the Case Management Order (ECF No. 146) provides that: “If counsel for the plaintiffs wishes to add new plaintiffs, they shall file on the Master Docket a motion to add plaintiff(s) and, for appellate record purposes, attach each proposed new plaintiff’s short form complaint as an exhibit to the motion.”

have not received a denial of claims, and more than ninety (90) days have passed since the Notices of Claims were mailed.

4. Accordingly, Plaintiffs now request permission from the Court to file short-form complaints (using the template approved in ECF No. 152) for the additional forty-four (44) plaintiffs.²

5. The following exhibits are attached to this motion:

- a. Attached as Exhibit 1 is an index of the forty-four (44) additional plaintiffs.
- b. Attached as Exhibits 2 through Exhibit 45 are short form complaints for each additional plaintiff.

Dated: June 11, 2024

Respectfully submitted,

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/s/ Corey M. Stern

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² Per L. U. Civ. R. 7(b)(10), Plaintiffs have conferred with the Defendants on this matter. There is no opposition to this motion.

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was served upon counsel of record and any unrepresented parties via the Court's ECF System to their respective email or first-class U.S. mail addresses disclosed on the Notice of Electronic Filing on June 11, 2024.

/s/ Corey Stern
COREY STERN